

# Exhibit C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ERIC INSELBERG and INSELBERG  
INTERACTIVE, LLC,

Plaintiff,

v.

BRIAN C. BROOK, ESQ.; TIMOTHY R.  
CLINTON, ESQ.; CLINTON BROOK & PEED;  
BROOK & ASSOCIATES, PLLC; CLINTON &  
PEED; and JOHN DOES, ESQS., 1-10 and JANE  
DOES, ESQS., 1-10 (a fictitious designation for  
presently unknown licensed attorneys,  
professionals and/or unknown persons or entities),  
jointly, severally and in the alternative,

Defendants.

Case No. \_\_\_\_\_

**CERTIFICATION IN SUPPORT OF  
NOTICE OF REMOVAL**

I, Brian Brook, Esq., hereby certify to the following facts:

1. I am an attorney at law licensed to practice in the States of New York, New Jersey, and the District of Columbia. I am the sole member of the Law Firm of Brook & Associates, PLLC, which was formerly a partner of Clinton Brook & Peed. I have personal knowledge of the facts certified to herein.

2. I make this certification to the court in support of a Notice of Removal of the above captioned action from the Superior Court of New Jersey, Law Division, Bergen County, to the United States District Court for the District of New Jersey.

**Amount in Controversy**

1. Although the Amended Complaint is far from clear about what damages are sought, it appears that the amount in controversy exceeds the \$75,000 jurisdictional threshold.

2. For example, certain claims appear to be based on Plaintiffs' representation by Defendants in connection with the matter Inselberg et al. v. Bisignano et al. (the "Bisignano

Matter”). The amount of legal fees charged to and paid by Plaintiffs in the Bisignano Matter was greater than \$100,000.

3. Inselberg’s decision to sue in this case could potentially jeopardize his recovery in connection with the settlement in the matter of Inselberg et al. v. New York Football Giants, Inc. et al. (the “Giants Matter”), due to the confidentiality provisions in place. Accordingly, to the extent that there is any dispute whether the amount in controversy exceeds \$75,000, we would ask that this Court enter a sealing order to protect Plaintiffs from such potential injury to themselves.

#### **Timeliness of Removal**

4. On July 21, 2020, I executed an acknowledgment of service on behalf of myself, Brook & Associates, PLLC, and Clinton Brook & Peed.

#### **Diversity of Citizenship**

5. Plaintiff Eric Inselberg is a citizen of New Jersey.

6. Upon information and belief, Eric Inselberg is the sole remaining member of Inselberg Interactive, LLC. Accordingly, its citizenship is determined by his citizenship, and it is a citizen of New Jersey.

7. To the extent that Martha Ard is still a member of Inselberg Interactive, LLC, then it does not change the diversity analysis because it is my understanding, based on the information previously disclosed to me by Eric Inselberg that she is a citizen of New Jersey as well. I have attempted a reasonable internet search and have found no information contradicting my understanding.

8. Based on my review of the Superior Court docket, the lawsuit being removed was filed on June 24, 2020.

9. At the time when this lawsuit was filed in state court, I was a citizen of the State of New York and resided at 420 W 25th Street, Apartment 4B, New York, New York. I have since permanently moved to California, but for purposes of diversity jurisdiction, the location of my residence at the time of filing is what matters.

10. Clinton Brook & Peed was a general partnership with two partners: Brook & Associates, PLLC and Clinton & Peed, PLLC. The partnership dissolved on December 31, 2018.

11. I am the sole member of Brook & Associates, PLLC. Accordingly, its citizenship is determined by my citizenship.


12. I have spoken with counsel for Defendants Clinton & Peed, PLLC and Timothy Clinton. Counsel advised that his clients' consent to this removal. He also confirmed the following information concerning his clients' citizenship.

13. Clinton & Peed, PLLC is a professional limited liability company with four members: three are residents in the District of Columbia, and one is a resident of Virginia.

14. Timothy Clinton is a citizen of the District of Columbia.

15. Therefore, there is complete diversity of citizenship between the parties.

I hereby certify that the foregoing statements are true and accurate to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.



Brian Brook

Date: August 19, 2020